REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed February 7, 2008. Reconsideration and allowance of the application and pending claims are respectfully requested.

I. Claim Rejections - 35 U.S.C. § 102(b)

Claims 1-5, 12-17, and 20-28 have been rejected under 35 U.S.C. § 102(b) as being anticipated by *Roztocil, et al.* ("Roztocil," U.S. Pub. No. 2001/0044868). Applicant respectfully traverses.

It is axiomatic that "[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration." *W. L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 1554, 220 U.S.P.Q. 303, 313 (Fed. Cir. 1983). Therefore, every claimed feature of the claimed invention must be represented in the applied reference to constitute a proper rejection under 35 U.S.C. § 102(b).

In the present case, not every feature of the claimed invention is represented in the Roztocil reference. Applicant discusses the Roztocil reference and Applicant's claims in the following.

A. The Roztocil Disclosure

Roztocil discloses a production work flow 100 of a "typically production print shop." *Roztocil*, paragraph 0020. The work flow 100 comprises various stages, including job origination 102, job submission 104, job preparation 106, print production 108, and final fulfillment 110. *Roztocil*, Figure 1.

As shown in Figure 1, the print shop includes a computer network 112 that includes computer work stations 114, 116, servers 118, 120, and output devices 122. *Roztocil*, paragraph 0021. A customer can submit a job during job origination 102 by either physically delivering to the print shop one or more documents in hard copy or electronic form or by transmitting the one or more documents to the print shop via the Internet. *Roztocil*, paragraph 0022. After that point, all aspects of the production work flow 100 are performed at the print shop using its network 112. *See Roztocil*, paragraphs 0023-0033.

Included in the production work flow 100 performed at the print shop is what Roztocil calls "user functionality workflow 200." *Roztocil*, paragraph 0034. That workflow 200 includes a preflight stage 204 that is performed using a workflow management software program that executes on a job preparation workstation 116 at the print shop. *Roztocil*, paragraph 0036. Using that program, operators at the print shop can obtain data about the various output devices 122 of the print shop, including their availability and capabilities. *Roztocil*, paragraph 0045.

As can be appreciated from the above, with the exception of transmitting documents over the Internet to Roztocil's print shop, no actions of Roztocil's disclosed production work flow are performed at a customer's (e.g., designer's) location.

B.   Applicant's Claims

Applicant's independent claim 1 provides as follows:

1.   A method of managing workflow in a commercial printing environment including a designer location and a print service provider location, said method comprising:

creating at the designer location a digital file that represents an image to be printed;

receiving at the designer location from the print service provider location real time configuration information regarding a print production device at the print service provider location;

creating at the designer location a high performance file using the real time configuration information from the print service provider location, the high performance file comprising the digital file that represents the image to be printed and processing instructions that indicate how a print job associated with the high performance file is to be processed;

submitting the high performance file from the designer location to the print service provider location via an electronic network;

verifying at the print service provider location that the print job will be processed at the print service provider location as indicated by the processing instructions contained in the high performance file and, if not, correcting the high performance file to ensure processing substantially as designed; and

performing at the print service provider location automated printing on a digital printer using, if created, the corrected high performance file, else using the verified high performance file.

Roztocil fails to teach several of the limitations of claim 1. As a first matter, Roztocil does not teach "receiving at the designer location from the print service provider location real time configuration information regarding a print production device

at the print service provider location". Although, Roztocil describes a customer transmitting a print job over the Internet to Roztocil's print shop (*Roztocil*, paragraph 0022), Roztocil does not indicate that any device configuration information is sent from the print service provider location to the designer location. Instead, as described above, all actions in Roztocil's production work flow 100, with the exception of transmitting the job via the Internet, are performed at Roztocil's print shop. Regarding the Examiner's identification of paragraph 0022 and 0023 of the Roztocil disclosure, those paragraphs say nothing of a designer (customer) location obtaining any device configuration information from a print service provider (print shop). Furthermore, Applicant notes that Roztocil says nothing about any location (including the designer location) receiving "real time" configuration information regarding a print production device.

As a second matter, Roztocil does not teach "creating at the designer location a high performance file using the real time configuration information from the print service provider location, the high performance file comprising the digital file that represents the image to be printed and processing instructions that indicate how a print job associated with the high performance file is to be processed". Although Roztocil describes the creation of a "ready for printer file" that includes a print job and a job ticket, Roztocil explicitly states that that file is created during "job preparation 106," which is performed at Roztocil's print shop by one of the print shop operators. *See Roztocil,* paragraphs 0027 and 0028. Therefore, no high performance file is created "at the designer location" as required by claim 1. Furthermore, because device no configuration information is sent from the print service provider location to the designer location, it follows that the

designer location cannot have created a high performance file "using the real time configuration information from the print service provider location".

In view of the foregoing, Roztocil does not anticipate Applicant's independent claim 1. Applicant therefore respectfully submits that claim 1 and its dependents are allowable. Applicant further submits that independent claim 20 and its dependents are allowable for similar reasons.

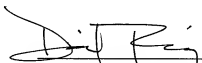## II.   Claim Rejections - 35 U.S.C. § 103(a)

Claims 18 and 19 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Roztocil*, as applied to claim 1, and further in view of *Kemp* (U.S. Pat. No. 2002/0078160). Applicant respectfully traverses.

As identified above, Roztocil does not teach aspects of Applicant's claims. In that Kemp does not remedy the deficiencies of the Roztocil reference, Applicant respectfully submits that claims 18 and 19 are allowable over the Roztocil/Kemp combination for at least the same reasons that claim 1 is allowable over Roztocil.

CONCLUSION

Applicant respectfully submits that Applicant's pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

David R. Risley
Registration No. 39,345